

From: [Gary Moore](#)
To: [Gloria-Small Moran](#)
Cc: [Chuck Talton](#); [Rafael Casanova](#)
Subject: Re: Falcon Refinery - Phone call from Steve Halasz, contractor
Date: 09/24/2003 07:01 PM

Gloria:

This is all up to Rafael. Although, I would assume that Rafael would require that the NORCO Contractor locate all of the samples taken on a visual map and then determine data gaps that need to be filled in order that the site can be adequately evaluated. I don't believe that Rafael wants to redo everything that was already done in the past but wants to build on that so that he can make an assessment of what actions need to be taken, if any, to address the site.

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**Gloria-Small
Moran**

To: Rafael Casanova/R6/USEPA/US@EPA
cc: Gary Moore/R6/USEPA/US@EPA, Chuck
Talton/R6/USEPA/US@EPA
Subject: Falcon Refinery - Phone call from Steve Halasz,
contractor

09/24/2003
06:11 PM

Hello Rafael,

I received a phone call from Steve Halasz, contractor for NORCO, concerning the same issue that he raised in the meeting last Thursday. He talked about the wetlands, and wondered, again, whether sampling could occur after the facility is torn down. Halasz again was concerned about the number of samples that would be required by EPA, and the cost associated with each sample (approximately \$100,000).

Halasz indicated the following:

1. There are more than 100 samples taken by TCEQ in the wetlands.
2. The data from the samples is not indicative that more sampling is needed (at this time).

I informed him that you had indicated:

1. The number of samples would be decided in discussions between EPA and the contractor during the scoping of the sampling.
2. That you would be "reasonable" in requesting samples, and that a grid on the entire wetland would not be required.

His request:



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Halasz wondered whether you conferred with a group (peer group) about the timing and number of samples required.

My response:

You ultimately answered to Myron Knudson, but that you also conferred with your managers and others about the sampling protocol to ensure consistency across sites.

Action:

What, if any, peer review occurs involving specific sampling protocols? Do you confer with any peer group about the manner of sampling?

I told Halasz that either you or I would get back to him with a response. (He is not suggesting that he speak personally with a peer group about this site).

Thanks and let me know.

Gloria
x3193